

Exhibit

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

CASE NO.: 0:24-cv-60721-RS

DAVID GORDON OPPENHEIMER,

Plaintiff,

v.

GAZETA BRAZILIAN NEWS
CORPORATION,

Defendant.

**DECLARATION OF JOEL B. ROTHMAN IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL DEFAULT**

I, Joel B. Rothman, declare and say:

1. I am an attorney duly licensed to practice before this Court, and I am counsel for Plaintiff DAVID GORDON OPPENHEIMER ("Oppenheimer") in the above-captioned matter.

I make this Declaration, which is filed in support of Plaintiff's Motion for Entry of a Final Judgment of Default and Incorporated Memorandum of Law, and I could and would testify competently to the matters set forth herein.

2. On April 30, 2024, Oppenheimer filed his Complaint against Defendant GAZETA BRAZILIAN NEWS CORPORATION ("Gazeta"). [DE 1].

3. Oppenheimer has incurred \$540.00 in costs in pursuit of this case.

4. This figure includes \$135.00 for process service and \$405.00 in filing fees.

5. In addition to these costs, Oppenheimer has incurred \$3,247.50 in attorney's fees.

6. Attached as Exhibit 3 is our invoice that details the work done by SRIPLAW in connection with this matter.

7. Though the matter was uncontested, considerable time was spent investigating the factual circumstances of the matter, drafting the notice letter to Gazeta, drafting the Complaint in this matter, obtaining the Default, and drafting the Motion for entering Default Judgment, and corresponding Declarations.

8. I am the Managing Partner at SRIPLAW, with over 25 years of legal experience.

9. Associate Sanje V. Lara has a billing rate is \$400.00 per hour and expended 1.2 hours on this matter. Sanje V. Lara was admitted to the Florida Bar in September 2021 and is an Associate at SRIPLAW who obtained her Juris Doctor and a Certificate in Intellectual Property Law from St. Thomas University College of Law.

10. Marian V. Quintero, a former Associate at SRIPLAW, had a billing rate of \$300.00 per hour, and expended 6.8 hours on this matter.

11. Marian V. Quintero was admitted to the Florida Bar in October 2022 and has a Certificate in Intellectual Property Law from St. Thomas University College of Law.

12. Paralegal Jamie James has a billing rate of \$275.00 per hour and expended 0.2 hours on this matter. Jamie James has over 20 years of legal experience, including nine years at SRIPLAW.

13. Paralegal Rebecca L. Pollack has a billing rate of \$175.00 per hour and expended 2.3 hours on this matter. Rebecca L. Pollack has over a year of legal experience.

14. Paralegal Christina Tcacisina has a billing rate of \$200.00 per hour and expended 0.3 hours on this matter. Christina Tcacisina has over seven years of legal experience, including one year at SRIPLAW.

15. Client Services Liaison Tyler Unfer has a billing rate of \$175.00 per hour and expended 1.2 hours on this matter. Tyler Unfer has almost two years of legal experience at SRIPLAW.

16. Following the lodestar method of multiplying the per hour billing rate times the number of hours expended on the matter, the total amount of attorney's fees is \$3,787.50.

17. These fees are reasonable because they reflect the market rate for services of similar quality and nature in the local area.

I declare under perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 30, 2024 at Boca Raton, Florida.

/s/ Joel B. Rothman
JOEL B. ROTHMAN